

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

No Regrets Properties, Inc. and Richard A.
Godley, Sr.

Plaintiffs,

v.

Neighborhood Sports Pub Concepts, Inc.,

Defendant.

C.A. No. 6:10-CV-1024-JMC

**PLAINTIFFS' RENEWED MOTION TO
REMAND**

Pursuant to 28 U.S.C. § 1447, Plaintiffs, No Regrets Properties, Inc. and Richard A. Godley, Sr., hereby renew their motion to remand this case to the South Carolina Court of Common Pleas for Greenville County. The reasons for this motion are that:

1. This court lacks subject matter jurisdiction because the amount in controversy does not exceed \$75,000, and damages pled in Defendant's recently-asserted counterclaims cannot satisfy the amount in controversy requirement necessary for removal and diversity jurisdiction, as more fully set forth in the Memorandum in Support of Plaintiffs' Motion; and
2. Defendant's notice of removal should be stricken because Defendant was a suspended California corporation and disqualified from participating in litigation pursuant to California law at the time of the attempted removal, as more fully set forth in the Memorandum in Support of Plaintiffs' Motion.

Respectfully submitted,

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s/ Gregory J. English

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September 13, 2010